

KIRTON LAW FIRM

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MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: June 15, 2020

June 15, 2020

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. I request that this Court accept defense filings received after the Court's deadline.

This Court ordered pretrial defense motions to be filed on or before May 4, 2020, and defense replies to be filed on or before June 1, 2020.¹ The defense filed motions on May 5, 2020, and a reply on June 2, 2020. Counsel has been inundated with requests from clients for bail considering the COVID-19 pandemic and was slightly late in filing the motions and the reply.² The defense requests that the Court accept the late filing. Furthermore, to avoid confusion of the record, the defense requests that docket entries #29 and #35 be deleted. The deletions allow the record to reflect the complete filing from the defense. The Government has consented to this request.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

¹ US PACER entry #25.

² The motions were filed a few hours after the deadline.

Marlon G. Kirton, Esq.

cc: Michael Krouse, Assistant United States Attorney (via electronic mail).
Jason Richman, Assistant United States Attorney (via electronic mail).
Esere Onaodowan, Esq. (via electronic mail)